

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

P&M SERVICES, INC.,)
Plaintiff)
)
v.)
)
ANDRE LAVALLEE,)
Defendant)

CIVIL ACTION NO. 04-40173-FDS
(BBO #633929)

MOTION OF ANDRE LAVALLEE TO ADMIT SETH E. RODACK PRO HAC VICE

I, James P. Hoban, hereby move for the admission of Seth E. Rodack to appear pro hac vice pursuant to Local Rule 83.5.3 on behalf of defendant Andre Lavallee ("Lavallee") and as grounds for this motion, state as follows:

1. I am a member of the bar of the Commonwealth of Massachusetts, the United States District Court for the District of Massachusetts, and the United States Court of Appeals for the First Circuit, and am appearing in this matter on behalf of Lavallee.

2. Attorney Seth Rodack ("Attorney Rodack") is a member of the law firm of Brooks Kushman, P.C., 1000 Town Center, 22nd Floor, Southfield, Michigan 48075. Attorney Rodack and his firm previously represented Lavallee's employer in other litigation between these parties in Michigan, Wisconsin, and California and is fully familiar with all of the factual and legal issues involved in this case.

3. Attorney Rodack is a member in good standing of the bars of the State of Michigan and the United States District Court for the Eastern District of Michigan. Attorney Rodack has not been denied admission to or disciplined by this Court or any other Court and is a member in good standing in every Court to which he has been admitted.

4. An Affidavit of Attorney Rodack attesting to the above facts is being filed with

this motion.

5. Given the previous participation of Attorney Rodack in other litigation between the plaintiff and Lavallee's employer, the interests of the parties and of justice will best be served by granting this motion to allow Attorney Rodack's participation, pro hac vice.

WHEREFORE, I request this Court to enter an Order admitting Attorney Seth Rodack to appear in this matter on behalf of Andre Lavallee and grant such other relief as the Court deems just and appropriate.

ANDRE LAVALLEE
By his attorney,

/s/ James P. Hoban
James P. Hoban (BBO #633929)
Bowditch & Dewey, LLP
311 Main Street, P.O. Box 15156
Worcester, MA 01615-0156
(508) 791-3511

Date: October 6, 2004

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(A)(2), I, James P. Hoban, local counsel for defendant Andre Lavallee, hereby certify that Seth Rodack, also counsel to Lavallee, and I conferred with Mark Demorest, counsel for plaintiff, P&M Services, Inc., on Wednesday, October 6, 2004, by telephone, and he assented to the allowance of this motion. I also spoke to local counsel for P&M Services, Inc., J. Kevin Grogan, on Wednesday, October 6, 2004, by telephone, and he also assented to the allowance of this motion.

/s/James P. Hoban
James P. Hoban